

EXHIBIT A

Page 1

1 UNITED STATES DISTRICT COURT
 2 SOUTHERN DISTRICT OF NEW YORK
 3 VALENTIA VILLETTI AND FAIZA JIBRIL, M.D.,
 4 Plaintiffs,
 5 - against -
 6 GUIDEPOINT GLOBAL, LLC,
 7 Defendant.
 8 Index No. 1:18-CV-10200-VSB-KNF
 9 -----X
 10 387 Park Avenue South
 11 New York, New York
 12 November 21, 2019
 13 2:03 p.m.
 14
 15 EXAMINATION BEFORE TRIAL OF GUIDEPOINT
 16 GLOBAL, by ALBERT SEBAG, a Defendant in the
 17 above-entitled action, taken by the Plaintiff,
 18 pursuant to Order, at the above time and place
 19 before Elisa Greenwald, a Notary Public within
 20 and for the State of New York.
 21
 22
 23 ELLEN GRAUER COURT REPORTING CO. LLC
 24 126 East 56th Street, Fifth Floor
 25 New York, New York 10022
 212-750-6434
 REF: 292264

Page 2

1 A P P E A R A N C E S :
 2
 3 LICHTEN & BRIGHT, P.C.
 4 Attorneys for the Plaintiffs
 5 387 Park Avenue South
 6 New York, New York 10016
 7 BY: STUART LICHTEN, ESQ.
 8 slichten@lichtenandbright.com
 9
 10
 11 GORDON REES SCULLY MANSUKHANI, LLP
 12 Attorneys for the Defendant
 13 One Battery Park Plaza, 28th Floor
 14 New York, New York 10004
 15 BY: DAVID GRECH, ESQ.
 16 dgrech@grsm.com
 17
 18 ALSO PRESENT:
 19 Catherine Smith, Esq. General Counsel for
 20 Guidepoint Global
 21 Valentia Villetti, Plaintiff
 22
 23
 24
 25

Page 3

1 ----- I N D E X -----
 2 WITNESS EXAMINATION BY PAGE
 3 ALBERT SEBAG MR. LICHTEN 5
 4
 5
 6 ----- E X H I B I T S -----
 7 PLAINTIFF'S DESCRIPTION FOR I.D.
 8 Exhibit 1 Email 5
 9 Exhibit 2 Email 5
 10 Exhibit 3 Email 5
 11 Exhibit 4 Email 5
 12 Exhibit 5 Email 5
 13
 14
 15 (EXHIBITS RETAINED BY MR. LICHTEN)
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Page 4

1 S T I P U L A T I O N S
 2
 3 IT IS HEREBY STIPULATED AND AGREED by
 4 and between the attorneys for the respective
 5 parties herein, that filing, sealing and
 6 certification, and the same are, hereby
 7 waived.
 8
 9 IT IS FURTHER STIPULATED AND AGREED
 10 that all objections except as to the form of
 11 the question, shall be reserved to the time of
 12 the trial.
 13
 14 IT IS FURTHER STIPULATED AND AGREED
 15 that the within deposition may be signed and
 16 sworn to by an officer authorized to
 17 administer an oath, with the same force and
 18 effect as if signed and sworn to before the
 19 Court.
 20
 21 XXXXX
 22
 23
 24
 25

Page 5

1 ALBERT SEBAG, the witness, after
2 having been first duly sworn by a Notary
3 Public of the State of New York, was examined
4 and testified as follows:
5
6 EXAMINATION BY
7 MR. LICHTEN:
8 Q Please state your name for the
9 record.
10 A Albert Sebag.
11 Q Please state your business address
12 for the record.
13 A 675 Avenue of the Americas, Second
14 Floor, New York, New York 10010.
15 (Whereupon, emails were marked
16 as Plaintiff's 1 through 5 for
17 identification, as of this date, by
18 the reporter.)
19 Q So your name is pronounced Sebag?
20 A Um-hum.
21 Q My name is Stuart Lichten. I am a
22 member of the firm Lichen & Bright and that
23 law firm represents the two plaintiffs in
24 this case. Their names are Valentia Villetti
25 and Faiza Jibril. They have brought a

Page 6

1 SEBAG
2 lawsuit against Guidepoint Global, LLC. You
3 are not a named defendant. Guidepoint Global
4 is the only named defendant. I am going to
5 ask you some questions today. If you don't
6 hear one of my questions, just let me know
7 and I will try to speak more clearly. If you
8 don't understand any of my questions, let me
9 know and I will try to clarify it and make it
10 so that you can understand it.
11 I just ask two things: One, wait
12 until I finish asking my question before you
13 start your answer and I in turn will wait
14 until you give your answer before I start the
15 next question. If we speak over each other
16 or interrupt each other, the court reporter
17 has a difficult time taking down an accurate
18 transcript. The other thing I would ask is
19 that you give your answers in spoken words,
20 not nods of the head or shakes of the head
21 because again it's very difficult for the
22 court reporter to take down those types of
23 expressions.
24 Have you ever had your deposition
25 taken before today?

Page 7

1 SEBAG
2 A. No.
3 Q. Have you ever been a witness in a
4 trial?
5 A. Yes.
6 Q. What type of trial?
7 A. Federal trial.
8 Q. What was the nature of the case?
9 A. It was -- one second. I don't
10 recall exactly. A former employee.
11 Q. The plaintiff was a former employee?
12 A. No, the plaintiff was -- one second.
13 I am trying to remember. This was years ago.
14 The plaintiff was I believe it was a federal
15 trial so that would be U.S.
16 Q. You were a witness or?
17 A. I was a witness.
18 Q. You don't remember the subject
19 matter of the trial, what it was about?
20 A. It was -- I actually don't remember.
21 It was years ago.
22 Q. What was your role in it?
23 A. I was a witness.
24 Q. A witness to the events?
25 A. Witness to emails.

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1 SEBAG
2 Q. How long ago was this?
3 A. At least eight years.
4 Q. Before coming today to give your
5 deposition other than your attorneys did you
6 speak with anyone specifically to prepare for
7 today's deposition?
8 A. No.
9 Q. Other than documents shown to you by
10 your attorneys, have you consulted or
11 reviewed any documents specifically to
12 prepare for today's deposition?
13 A. No.
14 Q. Can you briefly describe for us your
15 educational background?
16 A. I studied chemistry in college. I
17 went to law school and I have a PhD in
18 chemistry.
19 Q. Do you have a bachelor's degree?
20 A. Yes.
21 Q. From where?
22 A. Yeshiva College.
23 Q. That's in New York?
24 A. Yes.
25 Q. Do you have a JD degree?

Page 9

1 SEBAG
2 A. Yes.
3 Q. From where?
4 A. Boston College.
5 Q. You have a PhD I believe you said?
6 A. Yes.
7 Q. And from where did you receive that?
8 A. Northeastern.
9 Q. Have you earned any postgraduate
10 credits at any other university?
11 A. No.
12 Q. Have you ever taken the bar exam?
13 A. Yes.
14 Q. Did you pass it?
15 A. Yes.
16 Q. In what state or states?
17 A. New York.
18 Q. Have you ever practiced law?
19 A. Yes.
20 Q. Can you briefly describe for me your
21 educational -- your job history, employment
22 history since leaving college since leaving
23 Yeshiva?
24 A. One year at a law firm, New York law
25 firm.

Page 10

1 SEBAG
2 Q. What was the name of the firm?
3 A. The firm was Kenyon & Kenyon.
4 Q. Are they an intellectual property
5 firm?
6 A. Yes.
7 Q. After that year what did you do
8 next?
9 A. After that I started my company.
10 Q. What is your company?
11 A. Guidepoint.
12 Q. What year was that?
13 A. Around 2002.
14 Q. When was the year you spent at
15 Kenyon & Kenyon?
16 A. 2001.
17 Q. So what year did you receive your
18 PhD?
19 A. I don't recall.
20 Q. Was it in the 1990s?
21 A. I believe it was 2000 but I don't
22 recall exactly.
23 Q. Do you remember when you received
24 your JD?
25 A. 1999.

Page 11

1 SEBAG
2 Q. Your BA?
3 A. '95.
4 Q. So between prior to 2001 you had no
5 employment, full-time employment at any
6 place; correct?
7 A. That's correct.
8 Q. Your first job was Kenyon & Kenyon
9 and your second job was starting your own
10 firm, your own company?
11 A. Correct.
12 Q. What kind of company is Guidepoint?
13 What does it do?
14 A. It's an expert network.
15 Q. What does that mean?
16 A. It's a knowledge marketplace.
17 Q. You founded it in 2002?
18 A. Correct.
19 Q. At the time was it a limited
20 liability corporation?
21 A. I don't recall.
22 Q. At the time you began in 2002 did
23 you own all of it 100 percent?
24 A. Yes.
25 Q. In 2003 how many employees did it

Page 12

1 SEBAG
2 have?
3 A. I don't recall.
4 Q. Did it have more than 50?
5 A. No.
6 Q. Did it have more than 20?
7 A. No.
8 Q. Did it have more than ten?
9 A. I don't recall.
10 Q. What was your title in 2003 at
11 Guidepoint?
12 A. CEO.
13 Q. Any other title?
14 A. Founder.
15 Q. What were your duties and
16 responsibilities as CEO in 2003?
17 A. Chief executive officer.
18 Q. How many people directly reported to
19 you in 2003?
20 A. I don't recall.
21 Q. Do you recall anyone else who was
22 employed by the company in 2003?
23 A. I don't.
24 Q. Did the company in 2003 have a board
25 of directors?

Page 13

1 SEBAG
2 A. No.
3 Q. Let's go forward to 2018. In the
4 proceeding 16 years were you the CEO of
5 Guidepoint Global for that entire period?
6 A. Yes.
7 Q. In 2018 how many employees did
8 Guidepoint Global have?
9 A. I don't know.
10 Q. Did it have more than 50?
11 A. Yes.
12 Q. Did it have more than 100?
13 A. Yes.
14 Q. Did it have more than 200?
15 A. Yes.
16 Q. Did it have more than 300?
17 A. Yes.
18 Q. Did it have more than 500?
19 A. I don't know.
20 Q. Has the name of that company been
21 Guidepoint Global for the entire existence?
22 A. No.
23 Q. What was the name originally?
24 A. Clinical Advisers.
25 Q. That was the name in 2002?

Page 14

1 SEBAG
2 A. I believe so.
3 Q. For how long was it named Clinical
4 Advisers?
5 A. I don't recall.
6 Q. Was it named that until 2010?
7 A. I don't recall.
8 Q. The next name of the company was
9 Guidepoint Global?
10 A. Correct.
11 Q. In 2018 did Guidepoint Global have a
12 board of directors?
13 A. No.
14 Q. You have been the CEO the whole
15 time; is that correct?
16 A. Yes.
17 Q. In 2018 who directly reported to
18 you?
19 A. You want names?
20 Q. You can give me names or title or
21 both.
22 A. Cathy Smith.
23 Q. She is the general counsel; right?
24 A. Yes.
25 Q. Who else directly reported to you?

Page 15

1 SEBAG
2 A. Mike Ferrari sales, Stacy Longo
3 sales, John Campanella.
4 Q. Was he the CFO?
5 A. Yes. John Adkins.
6 Q. What is his title or what was his
7 title in 2018?
8 A. Head of international.
9 Q. Anyone else directly report to you
10 in 2018?
11 A. Eric Haynes.
12 Q. What was Mr. Haynes' title?
13 A. Data.
14 Q. Anyone else?
15 A. Priscilla Gulino.
16 Q. She is the head of HR?
17 A. HR.
18 Q. Anyone else?
19 A. That's all I can remember.
20 Q. Did someone named Bouker Pool
21 directly report to you?
22 A. When?
23 Q. In 2018?
24 A. Actually I'm not sure.
25 Q. In 2018 how many offices did

Page 16

1 SEBAG
2 Guidepoint Global have?
3 A. I don't know exactly.
4 Q. Do you know in how many countries it
5 had offices?
6 A. Countries?
7 Q. Yes.
8 A. I don't know exactly.
9 Q. Does it have more than 12 offices?
10 A. I actually don't know.
11 Q. Does it have an office in more than
12 three countries?
13 A. Yes.
14 Q. Does it have an office in more than
15 ten countries?
16 A. I don't know.
17 Q. Do you still own 100 percent of
18 Guidepoint Global?
19 A. Yes.
20 Q. Do you know who Valentia Villetti
21 is?
22 A. Yes.
23 Q. Who is she?
24 A. She is sitting next to you.
25 Q. When did you first learn of

Page 17

1 SEBAG
2 Ms. Villetti or first hear of her?
3 A. I don't recall.
4 Q. Did you play any role in the hiring
5 of Ms. Villetti?
6 A. The question is confusing.
7 Q. Ms. Villetti was an employee of
8 Guidepoint Global at one point; is that
9 correct?
10 A. Yes.
11 Q. She was hired on September 11, 2017;
12 is that correct?
13 A. I don't recall.
14 Q. Do you know what year she was hired
15 in?
16 A. No.
17 Q. When she was hired did you know that
18 she was hired by Guidepoint Global?
19 A. Yes.
20 Q. How did you know?
21 A. Because someone mentioned it to me.
22 Q. Who mentioned it to you?
23 A. I don't recall.
24 Q. What did they say?
25 A. I don't recall exactly what they

Page 18

1 SEBAG
2 said.
3 Q. But they said something about her
4 being employed by the company?
5 A. Something like that.
6 Q. Did you interview her for the job?
7 A. Actually I don't recall.
8 Q. Did you approve of her hire?
9 A. Yes.
10 Q. What was she specifically hired for,
11 what position?
12 A. Teleconferences.
13 Q. Was she a senior health care content
14 strategist?
15 A. That means nothing to me.
16 Q. What does teleconference mean when
17 you say that?
18 A. It's a moderated phone call with an
19 expert.
20 Q. How many people are on the line on
21 the phone call?
22 A. It all depends.
23 Q. When you say moderated who moderated
24 it?
25 A. A Guidepoint Global employee.

Page 19

1 SEBAG
2 Q. When you say that Ms. Villetti was
3 hired to do teleconferences was there a
4 specific number of teleconferences that she
5 was expected to complete?
6 A. There was an expectation.
7 Q. Of?
8 A. Two to three a week.
9 Q. And that since Ms. Villetti started
10 working at the company right from the
11 beginning of her tenure at the company she
12 was expected to do two or three?
13 A. About two.
14 Q. Did you have an opportunity to see
15 Ms. Villetti's work in the last quarter of
16 2017?
17 A. I don't recall.
18 Q. Did you have an opportunity to see
19 Ms. Villetti's work in the first quarter of
20 2018?
21 A. I don't recall.
22 Q. Did you ever have an opportunity to
23 see Ms. Villetti's work?
24 A. I had an opportunity.
25 Q. Did you take that opportunity?

Page 20

1 SEBAG
2 A. I don't recall ever seeing it.
3 Q. Have you ever spoken to
4 Ms. Villetti?
5 A. Yes.
6 Q. When was the first time you spoke to
7 her?
8 A. I really don't know.
9 Q. How many times do you estimate that
10 you have spoken to Ms. Villetti ever?
11 A. That's unclear. Several times.
12 Q. Do you think you have spoken with
13 her more than ten times ever?
14 A. Yes.
15 Q. Do you think you spoke with her more
16 than 20 times?
17 A. I don't recall.
18 Q. Could you describe for us the
19 quality of Ms. Villetti's work during the
20 entire time she worked at Guidepoint Global?
21 A. She did not meet our expectations of
22 performance.
23 Q. In what ways did she not meet the
24 company's expectations?
25 A. The number of teleconferences

Page 21

1 SEBAG
2 conducted or moderated was less than our
3 expectation.
4 Q. Did you ever tell Ms. Villetti that?
5 A. Yes.
6 Q. How?
7 A. On the phone.
8 Q. Any other way?
9 A. Through her managers.
10 Q. Who were her managers?
11 A. At the time I believe it was Bouker
12 Pool.
13 Q. Did she have any other manager?
14 A. No.
15 Q. Did you ever in writing tell her
16 that her teleconferencing was insufficient?
17 A. She didn't report to me.
18 Q. So the answer is no?
19 A. The answer is I don't believe so.
20 Q. Who did Bouker Pool report to?
21 A. Me.
22 Q. Did you ever have a discussion with
23 Mr. Pool of Ms. Villetti's work performance?
24 A. Yes.
25 Q. How many of those discussions did

Page 22

1 SEBAG
2 you have?
3 A. I don't recall.
4 Q. Is it more than five?
5 A. I don't recall.
6 Q. Do you remember specifically any of
7 them like what you said?
8 A. I remember discussing poor
9 performance.
10 Q. Was her performance poor in any way
11 other than the number of teleconferences she
12 completed?
13 A. I don't recall.
14 Q. Do you know whether or not
15 Ms. Villetti was late to work?
16 A. I don't recall.
17 Q. Do you know whether or not
18 Ms. Villetti's attendance was not up to
19 expectations?
20 A. I don't recall.
21 Q. Do you remember whether Ms. Villetti
22 had any conflicts with colleagues?
23 A. Yes.
24 Q. What conflicts with colleagues did
25 she have?

Page 23

1 SEBAG
2 A. She wasn't liked.
3 Q. By whom?
4 A. Other team members, her team
5 members.
6 Q. Can you name any of them?
7 A. I don't recall the names.
8 Q. How did you find out that
9 Ms. Villetti wasn't liked by her team
10 members?
11 A. Direct complaints.
12 Q. From the team members?
13 A. Yes.
14 Q. To you?
15 A. Yes.
16 Q. But you don't remember any of the
17 names?
18 A. I don't recall right now the names.
19 Q. Did Ms. Villetti ever refuse to
20 work?
21 A. She didn't report to me.
22 Q. So you are saying that you don't
23 know?
24 A. I don't know.
25 Q. Are you familiar with the term call

Page 24

1 SEBAG
2 schedule?
3 A. Can you repeat that?
4 Q. Are you familiar with the term call
5 schedule?
6 A. No.
7 Q. I would like to show you what we
8 have marked Plaintiff's Exhibit 1. Can you
9 look at Plaintiff's Exhibit 1, please.
10 A. (Complies).
11 Q. Have you ever seen Plaintiff's
12 Exhibit 1 before?
13 A. No.
14 Q. Do you recognize any of the emails
15 in Plaintiff's Exhibit 1?
16 A. No.
17 Q. Do you know who Jessica
18 Kagin-Tropea, K-A-G-I-N-hyphen-T-R-O-P-E-A,
19 do you know who that is?
20 A. Yes.
21 Q. Who is she?
22 A. She was a Guidepoint Global
23 employee.
24 Q. Do you know what her title was?
25 A. No.

Page 25

1 SEBAG
2 Q. Do you know what her function was?
3 A. She was part of the events team.
4 Q. Is she one of the colleagues who you
5 said disliked Ms. Villetti?
6 A. I never said anyone disliked her.
7 Q. Well, is she one of the team members
8 who you said had a conflict with her?
9 A. Possibly.
10 Q. When did Ms. Kagin-Tropea work for
11 Guidepoint Global?
12 A. I don't recall.
13 Q. Was she working for the company in
14 2018?
15 A. Appears to be.
16 Q. What happened? Was she dismissed or
17 was she -- did she resign? Why isn't she
18 there any longer?
19 A. I actually don't know.
20 Q. You don't know?
21 A. (Nodding).
22 Q. In 2018 was Bouker Pool someone who
23 directly reported to you?
24 A. Maybe parts of 2018.
25 Q. Why do you say that?

Page 26

1 SEBAG
2 A. I don't know when he left.
3 Q. Do you know who he directly reported
4 to if it wasn't you?
5 A. It would have been me.
6 Q. He directly reported to you?
7 A. Yes.
8 Q. Did Mr. Pool ever come to you to
9 discuss imposing a PIP on Ms. Villetti?
10 A. I don't recall.
11 Q. I would like to show you what we
12 have marked as Plaintiff's Exhibit 2.
13 A. (Perusing).
14 Q. Have you looked at Exhibit 2?
15 A. Yes.
16 Q. Do you recognize it?
17 A. Somewhat.
18 Q. What do you recognize it somewhat to
19 be?
20 A. I remember this actual event.
21 Q. What was the event?
22 A. The event was Valentia not doing her
23 job.
24 Q. And why was she not doing her job?
25 A. Because she wasn't.

Page 27

1 SEBAG
2 Q. What about this event was her not
3 doing her job?
4 A. Her job was conducting
5 teleconferences.
6 Q. What was she doing here?
7 A. She was attending an event.
8 Q. That event was in Boston; is that
9 right?
10 A. Apparently.
11 Q. How did you find out she was
12 attending this event?
13 A. I don't recall.
14 Q. Now, your first phone call on this
15 document exhibit was March 1, 2018 at
16 10:49 a.m. It's on the second page third up
17 from the bottom.
18 MR. GRECH: Objection. Are you
19 talking phone calls or emails?
20 MR. LICHTEN: We are talking
21 emails, the first emails.
22 MR. GRECH: The question was phone
23 call. I just wanted to be clear.
24 MR. LICHTEN: Okay, I'm sorry.
25 Q. Do you see that email?

Page 28

1 SEBAG
2 A. Which email?
3 Q. 10:49 a.m. All of these emails took
4 place on March 1, 2018.
5 A. Can you show me? I don't see it.
6 Q. There.
7 A. Yes.
8 Q. It says, "Valentia, who asked you to
9 go to Boston and deal with Blackrock? Just
10 need to understand what is happening."
11 Did I read that correctly?
12 A. That's what it says.
13 Q. Do you remember writing that?
14 A. I don't.
15 Q. Then Ms. Villetti responded at 11:28
16 with a several paragraph email, several
17 paragraph long email. Do you see that
18 starting on the first page going into the
19 second? Do you see that?
20 A. Yes.
21 Q. Did you receive that email?
22 A. I think we are confusing things.
23 Q. Okay.
24 A. This email is after that email.
25 Q. Right. Well, so at 12:04 p.m. you

Page 29

1 SEBAG
2 responded to Ms. Villetti's 11:28 a.m. email;
3 is that right?
4 A. I don't see that. Yes.
5 Q. You told her that, "From now on your
6 focus is 100 percent on teleconference.
7 Someone else will take over in-person events.
8 Clear?" Is that what you wrote?
9 A. Yes.
10 Q. Is that a change in her function
11 that she was going to be 100 percent on
12 teleconferences or is that a continuation of
13 what her job had always been?
14 A. It is a continuation of what her job
15 had always been.
16 Q. She had no role to play in in-person
17 events; is that correct?
18 A. Zero role.
19 Q. Who was in charge of in-person
20 events?
21 A. Not her.
22 Q. Was it Ms. Kagin-Tropea?
23 A. It could have been Jessica, it could
24 have been others.
25 Q. You don't remember?

Page 30

1 SEBAG
2 A. Exactly.
3 Q. Now, at 1:26 p.m. which is on the
4 second page starting at about halfway you
5 sent Ms. Villetti another email with three
6 question marks; do you see that?
7 A. Yes.
8 Q. Now, that email you sent to
9 Ms. Villetti you CC'd Ms. Gulino and
10 Ms. Kagin-Tropea; do you see that?
11 A. Yes.
12 Q. Why did you CC Ms. Kagin-Tropea?
13 A. I don't recall.
14 Q. Why did you CC Ms. Gulino?
15 A. I don't recall.
16 Q. Now, prior to that date March 1,
17 2018 do you know whether or not Ms. Villetti
18 had attended any other in-person events?
19 A. No.
20 Q. You don't know?
21 A. I didn't believe she did.
22 Q. What was Ms. Villetti's job
23 entitlements regarding travel? Could she
24 travel if it was part of her job or was she
25 forbidden from traveling on the company's

Page 31

1 SEBAG
2 dime? What was her relationship to travel?
3 MR. GRECH: Objection. You can
4 maybe break that up.
5 Q. All right. As part of her
6 legitimate job duties, was Ms. Villetti
7 allowed to travel?
8 A. Her job was conducting
9 teleconferences which required no traveling.
10 Q. Do you know whether or not prior to
11 March 1st she had traveled anywhere as part
12 of her job?
13 A. I was not aware of it.
14 Q. After March 1st did she perform
15 100 percent of her job duties on
16 teleconferences?
17 A. I don't know.
18 Q. Did you on or about March 1st talk
19 to Mr. Pool regarding Ms. Villetti's
20 teleconferencing?
21 A. Yes.
22 Q. What was that discussion?
23 A. That the performance was not
24 adequate.
25 Q. She had not been meeting two to

Page 32

1 SEBAG
2 three per week numbers; is that right?
3 A. Around two, correct.
4 Q. What did Mr. Pool say?
5 A. I don't recall.
6 Q. Did you play any role in the
7 discharge of Ms. Villetti?
8 A. I don't recall.
9 Q. I would like for you to look at what
10 we have marked as Exhibit 3.
11 A. (Complies).
12 Q. Have you looked at Exhibit 3?
13 A. Yes.
14 Q. Have you ever seen Exhibit 3 before?
15 A. I don't recall.
16 Q. Were you aware that Ms. Kagin-Tropea
17 complained to Ms. Gulino about Ms. Villetti?
18 A. I was aware that there were
19 complaints.
20 Q. You didn't know who the complaints
21 were from?
22 A. I don't recall who they were from.
23 Q. I would like for you to look at what
24 we have marked as Exhibit 4.
25 A. (Complies).

Page 33

1 SEBAG
2 Q. Have you had a chance to look at
3 Exhibit 4?
4 A. Yes.
5 Q. Have you ever seen it before?
6 A. No.
7 Q. Have you ever been told that
8 Ms. Villette sent in this complaint to
9 Ms. Gulino on March 12th?
10 A. I don't recall.
11 Q. Did you ever discuss this complaint
12 with anybody?
13 A. I don't recall.
14 Q. I would like to show you what we
15 have marked as Exhibit 5.
16 A. (Perusing).
17 Q. Have you had a chance to look at
18 Exhibit 5?
19 A. Yes.
20 Q. Have you ever seen it before?
21 A. I don't recall seeing it.
22 Q. Have you ever discussed the fact
23 that Mr. Pool filed a formal complaint
24 pursuant to the discrimination or harassment
25 policy with anybody?

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1 SEBAG
2 A. I don't recall.
3 Q. At the time of this -- this says
4 March 16, 2018 at the top. On that date were
5 you Mr. Pool's direct supervisor?
6 A. I believe so.
7 Q. Does Mr. Pool still work for
8 Guidepoint Global?
9 A. No.
10 Q. What happened to him?
11 A. He left.
12 Q. When did he leave?
13 A. I don't recall.
14 Q. Did he leave in March of 2018?
15 A. I don't recall.
16 Q. Are you saying he was not dismissed
17 when you say he left?
18 A. I believe he was dismissed.
19 Q. So the company dismissed him; is
20 that correct?
21 A. Actually I don't recall.
22 Q. You don't know whether he was
23 dismissed or whether he left voluntarily?
24 A. Yes.
25 Q. Do you know someone named Rutwik

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1 SEBAG
2 R-U-T-W-I-K, Ghodadra, G-H-O-D-A-D-R-A?
3 A. I know someone named Rutwik, yes.
4 Q. Rutwik is his first name?
5 A. Yes.
6 Q. Who is he?
7 A. He is a Guidepoint Global employee.
8 Q. How long has he been employed by
9 Guidepoint Global?
10 A. I don't know.
11 Q. Has he been employed there more than
12 two years?
13 A. I don't know.
14 Q. Was he employed at Guidepoint Global
15 in March of 2018?
16 A. I'm not sure.
17 Q. Before he was employed by Guidepoint
18 Global did he play any other role with
19 respect to Guidepoint Global such as a
20 consultant?
21 A. He was a client.
22 Q. A client. When was he a client?
23 A. I don't know exactly what dates.
24 Q. Was he ever a consultant to
25 Guidepoint Global, not employed, consultant?

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1 SEBAG
2 A. Possibly. I don't recall.
3 Q. What is his job function? What does
4 he do?
5 A. Now?
6 Q. Now.
7 A. I don't know his title but he is
8 head of events in some way.
9 Q. How long has he been head of events?
10 A. I don't know.
11 Q. Do you know where he worked before
12 he was employed by Guidepoint Global?
13 A. Yes.
14 Q. Where did he work?
15 A. Visium Asset Management.
16 Q. What did he do for them?
17 A. He was a portfolio manager.
18 Q. Do you know how long he worked for
19 Visium?
20 A. I don't.
21 Q. How did his employment end at
22 Visium?
23 A. Visium closed.
24 Q. Did Visium close because of a
25 dispute with the government, the federal

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1 SEBAG
2 government?
3 A. I don't know if that's the only
4 reason they closed.
5 Q. But it's a reason?
6 A. Possibly.
7 Q. Did Mr. Ghodadra have anything to do
8 with that dispute with the government that
9 Visium had?
10 A. Not that I am aware.
11 Q. Did anyone ever complain to you
12 about the way Mr. Ghodadra was treating them
13 in the work place, any employee ever complain
14 to you about the way Mr. Ghodadra was
15 treating them?
16 A. I don't recall, no.
17 Q. Did you ever hear that Mr. Ghodadra
18 was abusive in the work place?
19 A. No.
20 Q. During Ms. Villetti's tenure with
21 Guidepoint Global did she ever have the
22 authority to hire someone who was going to
23 report to her?
24 A. No.
25 Q. Did Mr. Pool ever have the authority

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1 SEBAG
2 to hire someone who was to report to
3 Ms. Villetti?
4 A. Two different questions.
5 Q. The last two questions? Well, did
6 Mr. Pool ever have the authority to hire
7 someone who would then directly report to
8 Ms. Villetti?
9 A. He had the authority to hire.
10 Q. Did he hire someone in January of
11 2018 that was to directly report to
12 Ms. Villetti?
13 A. I do not know.
14 Q. Your answer is I don't know?
15 A. I don't know.
16 Q. Do you know who Faiza Jibril is?
17 A. No.
18 Q. Have you ever been told that
19 Ms. Jibril was about to be hired by
20 Guidepoint Global?
21 A. No.
22 Q. Did you ever veto Dr. Jibril's hire?
23 A. I don't recall.
24 Q. You don't recall whether or not you
25 vetoed her hire?

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1 SEBAG
2 A. I don't.
3 MR. GRECH: Objection. Asked and
4 answered.
5 Q. Did you veto someone's
6 recommendation that someone be hired to
7 report to Ms. Villetti?
8 MR. GRECH: Objection.
9 A. Can you repeat.
10 Q. Did you ever veto a recommendation
11 that a person be hired to report directly to
12 Ms. Villetti?
13 A. I don't recall such an incident.
14 Q. Did you have to approve any new
15 hires at Guidepoint Global?
16 A. I don't understand your question.
17 Q. In order for the company to hire
18 someone new did you have to give your okay?
19 A. It depends.
20 Q. What did it depend on?
21 A. The role.
22 Q. If the role was someone was going to
23 be hired to be a health care content
24 strategist and would directly report to
25 Ms. Villetti, would you have to approve of

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1 SEBAG
2 that hire?
3 A. It would depend.
4 Q. On what?
5 A. The qualifications of that
6 candidate.
7 Q. Whether or not you had to give your
8 okay would depend on the qualifications of
9 the candidate?
10 A. That's correct.
11 Q. Under what circumstances would you
12 not have to give your okay?
13 A. If the person was not a former
14 buy-side analyst.
15 Q. What does buy-side analyst mean?
16 A. Someone who worked for an investment
17 firm.
18 Q. So if they worked for an investment
19 firm they did have to get an okay or if they
20 didn't work for an investment firm they did
21 not?
22 A. If they didn't work for an
23 investment firm.
24 Q. They would have to get your okay?
25 A. Correct.

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1 SEBAG
 2 Q. What about if they didn't have
 3 sell-side experience would they still have to
 4 get your okay?
 5 A. Yes.
 6 Q. Did it occur that someone without
 7 buy-side and without sell-side experience was
 8 recommended for hire by Mr. Pool?
 9 A. I don't remember.
 10 Q. Today how many health care content
 11 strategists are employed by Guidepoint Global
 12 in the New York office?
 13 A. I don't know.
 14 Q. Is it more than ten?
 15 A. I don't know.
 16 Q. Do you know who Ashley Dunston is?
 17 A. Yes.
 18 Q. Who is she?
 19 A. A former Guidepoint Global employee.
 20 Q. What was her function?
 21 A. She had several roles.
 22 Q. What were they?
 23 A. Project manager, recruiter, manager,
 24 events.
 25 Q. Anything else?

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1 SEBAG
 2 A. That's all I can recall.
 3 Q. How long did Ms. Dunston work for
 4 Guidepoint Global?
 5 A. About ten years.
 6 Q. Does she still work there?
 7 A. No.
 8 Q. Was she dismissed?
 9 A. I believe so, yes.
 10 Q. Why?
 11 A. She was difficult to work with.
 12 Q. Did you play any role in her
 13 dismissal?
 14 A. I agreed to it.
 15 Q. Who proposed it?
 16 A. HR.
 17 Q. Would that be Ms. Gulino?
 18 A. Yes.
 19 Q. Do you know who -- well, strike
 20 that.
 21 Ms. Jessica Kagin-Tropea do you know
 22 whether or not she ever took maternity leave?
 23 A. Yes, she did.
 24 Q. How long was she out?
 25 A. I don't recall.

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1 SEBAG
 2 Q. When she came back was she able to
 3 resume employment with Guidepoint Global when
 4 her leave ended?
 5 A. Yes.
 6 Q. For how long after her leave ended
 7 was she employed by Guidepoint Global?
 8 A. I don't recall.
 9 Q. Was she dismissed?
 10 A. I actually don't recall.
 11 Q. Did she ever write a letter to
 12 Guidepoint Global or her attorney threatening
 13 to sue the company?
 14 A. I don't recall.
 15 Q. Did the company enter into a
 16 settlement agreement with Ms. Kagin-Tropea?
 17 MR. GRECH: Objection.
 18 MR. LICHTEN: What is the
 19 objection?
 20 MR. GRECH: You can answer.
 21 A. I don't recall.
 22 Q. Do you know who Ilyssa McIntyre
 23 Smith, I-L-Y-S-S-A, M-C-I-N-T-Y-R-E, Smith,
 24 do you know who that is?
 25 A. Yes.

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1 SEBAG
 2 Q. Who is she?
 3 A. She was a Guidepoint Global
 4 employee.
 5 Q. What was her function?
 6 A. Marketing.
 7 Q. When did she first become employed
 8 by Guidepoint Global?
 9 A. I don't remember.
 10 Q. Was it more than five years?
 11 A. I don't remember.
 12 Q. Is she still employed by Guidepoint
 13 Global?
 14 A. No.
 15 Q. When did she leave the company?
 16 A. I don't remember.
 17 Q. Was she dismissed?
 18 A. I don't believe so.
 19 Q. Do you know who Natalia Ramirez is?
 20 A. Yes.
 21 Q. Who is she?
 22 A. She was a Guidepoint Global
 23 employee.
 24 Q. What was her function?
 25 A. Executive assistant.

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1 SEBAG
 2 Q. To whom?
 3 A. To me.
 4 Q. For how long was she executive
 5 assistant?
 6 A. About five years.
 7 Q. Is she still employed by the
 8 company?
 9 A. No.
 10 Q. When did she leave?
 11 A. Four months ago or so.
 12 Q. Was she dismissed?
 13 A. No.
 14 Q. Do you know whether Guidepoint
 15 Global instituted any investigation of
 16 discrimination surrounding Ms. Villetti's
 17 departure from the company?
 18 A. Can you repeat that.
 19 Q. Did Guidepoint Global institute or
 20 initiate an investigation of the
 21 circumstances of Ms. Villetti's dismissal?
 22 A. I don't know.
 23 Q. What are the office hours of
 24 Guidepoint Global's office in New York?
 25 A. I don't know.

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1 SEBAG
 2 Q. Do you know whether it has office
 3 hours?
 4 A. Yes.
 5 Q. But you don't know what the hours
 6 are?
 7 A. I don't.
 8 MR. LICHTEN: Can I have a break.
 9 (A short recess was taken.)
 10 Q. Did you play any role in the hiring
 11 of Bouker Pool?
 12 A. Yes.
 13 Q. What was your role?
 14 A. My role was to hire him.
 15 Q. What were his qualifications?
 16 A. He had extensive marketing
 17 background.
 18 Q. In what fields, what industries?
 19 A. Different industries.
 20 Q. Did he ever work for an investment
 21 bank?
 22 A. I don't recall.
 23 Q. Mr. Pool was his last day with the
 24 company the same as Ms. Villetti's last day?
 25 A. I actually don't know.

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1 SEBAG
 2 Q. Now, Ms. Kagin-Tropea was she -- did
 3 any of her colleagues complain about their
 4 ability to work with her?
 5 A. I don't recall.
 6 Q. Was she given permission to work
 7 remotely from her home?
 8 A. Yes.
 9 Q. How did that work? How many days a
 10 week did she come into the office and how
 11 often did she work from home?
 12 A. I don't recall the specifics.
 13 Q. Do you know whether or not she spent
 14 one day a week in the office?
 15 A. I don't remember the specifics.
 16 Q. Did you ever have a conversation
 17 with Mr. Pool regarding dismissing
 18 Ms. Kagin-Tropea?
 19 A. I don't recall that.
 20 Q. Are you familiar with the
 21 abbreviation CU with regards to
 22 teleconferencing?
 23 A. Yes.
 24 Q. What does CU stand for?
 25 A. Consultation unit.

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1 SEBAG
 2 Q. What is it?
 3 A. What is it?
 4 Q. What does it mean?
 5 A. It's when a client conducts a phone
 6 call or participates in a teleconference.
 7 They get charged and the charge is referred
 8 to as a CU.
 9 Q. Did you ever compare the CUs
 10 resulting from Ms. Villetti's calls with
 11 anyone else's CU total?
 12 A. I don't recall.
 13 Q. Do you know whether or not she had
 14 an above average CU total?
 15 A. I don't recall.
 16 Q. Did anyone ever complain to you
 17 about Rutwik's behavior in the office?
 18 A. No.
 19 Q. Did you have any personal
 20 relationships with employees of Guidepoint
 21 Global while they were employees of
 22 Guidepoint Global?
 23 A. What do you mean?
 24 Q. Well, did you have a sexual
 25 relationship with anybody?

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1 SEBAG
2 A. No.
3 Q. I think you testified that you
4 weren't sure whether Mr. Pool left
5 voluntarily or was dismissed; is that
6 correct?
7 A. I don't recall how he left.
8 Q. Did Mr. Pool ever complain to you
9 about Ms. Villetti?
10 A. Yes.
11 Q. What did he say?
12 A. Performance.
13 Q. What about her performance?
14 A. The number of teleconferences
15 conducted were insufficient.
16 Q. Anything else?
17 A. Her inability to get along with
18 other employees.
19 Q. Mr. Pool did he mention any names of
20 people who were --
21 A. I don't recall.
22 Q. Did you ever receive any complaints
23 about Mr. Pool?
24 A. I actually don't recall that.
25 Q. Did you play any role in the hiring

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1 SEBAG
2 of Rutwik?
3 A. Yes.
4 Q. What was your role?
5 A. I introduced him to the company.
6 Q. What were his qualifications?
7 A. He was a buy-side portfolio manager.
8 MR. LICHTEN: I think I might be
9 done if you give me a few minutes.
10 (A short recess was taken.)
11 Q. Just a couple more. You testified
12 at the beginning that you were a witness in a
13 case involving the United States?
14 A. Yes.
15 Q. Was that case involving the
16 Securities and Exchange Commission?
17 A. No.
18 Q. Have you ever been investigated by
19 the SEC?
20 A. Never.
21 MR. LICHTEN: All right, I have
22 nothing further.
23 MR. GRECH: Thank you.
24 (Time noted: 3:23 p.m.)
25

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1 A C K N O W L E D G E M E N T
2
3 STATE OF NEW YORK)
4 :SS
5 COUNTY OF NEW YORK)
6
7 I, ALBERT SEBAG, hereby certify that I
8 have read the transcript of my testimony taken
9 under oath on November 21, 2019, that the
10 transcript is a true, complete and correct
11 record of what was asked, answered and said
12 during my testimony under oath, and that the
13 answers on the record as given by me are true
14 and correct.
15
16
17
18 ALBERT SEBAG
19
20 Signed and subscribed to
21 before me, this ____ day
22 of _____, _____.
23
24
25 Notary Public

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1 C E R T I F I C A T E
2
3 I, Elisa Greenwald, a shorthand
4 reporter and Notary Public within and for the
5 State of New York, do hereby
6 certify:
7 That the within statement is a true
8 and accurate record of the stenographic notes
9 taken by me.
10 I further certify that I am not
11 related to any of the parties to this action
12 by blood or marriage, and that I am in no way
13 interested in the outcome of this matter.
14 Dated this 6th day of December, 2019.
15
16
17
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19
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21
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23
24
25 ELISA GREENWALD